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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LATONIA W. LISTER,

Plaintiff,

vs.

CITY OF LAS VEGAS; DOES I-X,
inclusive, and ROE ENTITIES I-X,
inclusive,

Defendant.

CASE NO. 2:21-cv-0589-JAD-VCF

**STIPULATION AND REQUEST TO
EXTEND DISCOVERY DEADLINE**

(First Request)

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the close of discovery and all associated dates pursuant to Fed R. Civil P. 26(a)(2) sixty (60) days, up to and including April 25, 2022. In support of this Stipulation and Request, the parties state as follows:

1. On April 12, 2021, this action was commenced by the filing of a Complaint in the United States District Court, District of Nevada.
2. On July 28, 2021, Defendant City of Las Vegas filed its Answer to Plaintiff's Complaint.
3. On August 5, 2021, the City of Las Vegas made its initial disclosures in accordance with F.R.C.P. 26(a)(1).
4. On September 8, 2021, Plaintiff made her initial disclosures in accordance with F.R.C.P. 26(a)(1).
5. On September 15, 2021, the Stipulated Discovery Plan and Scheduling Order was

1 filed.

2 6. On August 26, 2021, the City of Las Vegas served Plaintiff interrogatories and
3 requests for production. For medical reasons, Plaintiff was unable to timely respond and
4 ultimately served her responses on November 19, 2021.

5 7. On September 15, 2021, Plaintiff served the City of Las Vegas interrogatories and
6 requests for production. The City of Las Vegas served its responses on November 15, 2021.

7 **REASONS WHY DISCOVERY WAS NOT COMPLETED**

8 Plaintiff recently underwent surgery and had a protracted recovery. Discovery was
9 essentially at a standstill as Plaintiff recovered.

10 **DISCOVERY REMAINING**

11 Plaintiff Latonia W. Lister needs to conduct depositions of numerous former and current
12 City of Las Vegas employees.

13 The City of Las Vegas needs to conduct the deposition of Plaintiff, various percipient
14 witnesses, and Plaintiff's yet to be named expert witness. The City may also need to conduct an
15 independent medical examination of Plaintiff. Because Plaintiff was medically unable respond
16 to the written discovery served by the City of Las Vegas and her responses were delayed
17 approximately two months, the City was similarly delayed in its ability to gather Plaintiff's
18 relevant records and identify witnesses to be deposed. This delay also stymied the City's ability
19 to evaluate and retain experts for this matter.

20 **PROPOSED NEW DISCOVERY DATES**

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	February 23, 2022	April 25, 2022
Extension of Discovery Deadline	February 2, 2022	April 25, 2022
Expert Disclosure pursuant to Fed R. Civil P. 26(a)(2)	December 27, 2021	February 25, 2022
Rebuttal Expert Disclosure pursuant to Fed R. Civil P. 26(a)(2)	January 26, 2022	March 28, 2022

Dispositive Motions	March 25, 2022	May 24, 2022
Joint Pretrial Order	April 25, 2022	June 24, 2022

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery in this case and adequately prepare their respective cases for trial.

This is the first request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the additional extension.

WHEREFORE, the parties respectfully request that this Court extend the discovery dates as set forth above.

Dated this 13th day of December 2021.

BRYAN K. SCOTT, ESQ.
City Attorney

/s/ Jeffrey L. Galliher

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City of Las Vegas*

Dated this 13th day of December 2021.

F. TRAVIS BUCHANAN, ESQ. &
ASSOCIATES, PLLC

/s/ F. Travis Buchanan

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ORDER

IT IS SO ORDERED.

Dated this 14th day of December 2021.

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.



U.S. MAGISTRATE JUDGE